

PRIVACY POLICY

CS ADVISORS INC.

PRIVACY POLICY NOTICE

Date: March, 2020

This Privacy Policy Notice describes our privacy policy and how we collect and process personal information about you, how this information is protected, and your rights.

We are committed to protecting the confidentiality and security of information we collect about our customers. We will not share nonpublic information about you ("Your Information") with third parties outside of your custodian/brokerage firm and other service providers without your consent, except for the specific purposes described below. This notice describes the Your Information we may gather and the circumstances under which we may share it. Your custodian/brokerage firm, third party managers and other service providers should have an additional separate privacy policy, which explains their privacy practices.

Why We Collect and How We Use Your Information: We limit the collection and use of Your Information to the minimum we require to enter into or fulfil our contractual obligations with you and deliver superior service to you. Such service includes managing your account(s), processing transactions on your behalf and administering our business. We are also required by law to collect and use certain personal information about you, for example, we obtain proof of your identity to enable us to meet our anti-money laundering obligations; and we obtain certain information such as your tax status, investment objectives or risk tolerance to satisfy our suitability obligations.

Personal Information We Collect: The main categories of information that we collect about you are:

- personal details (e.g. name, date of birth, social security or tax ID number);
- contact details (e.g., address, telephone number, email);
- employer name; and
- information regarding your financial objectives and risk tolerance.

How We Gather Your Information: We get most Your Information directly from you, when you apply for, access and use financial products and services offered by CS Advisors, Inc. and its business partners - whether in person, by telephone or electronically. We may verify this

information or get additional information from consumer reporting agencies or public sources. The main categories of information that we collect about you are: personal details (e.g. name, date of birth, social security or tax ID number); contact details (e.g., address, telephone number, email); employer name; information regarding your financial objectives and risk tolerance. This Your Information may also relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions with us, or others.

How We Protect Your Information: Our employees are required to protect the confidentiality of Your Information and to comply with our established policies. They may access Your Information only when there is an appropriate reason to do so, such as to administer our products or services. Employees who violate our Privacy Policy are subject to disciplinary process. We also maintain commercially reasonable physical, electronic and procedural safeguards to protect Your Information from misuse and loss and from unauthorized access, modification or disclosure. Despite these measures, however, we cannot guarantee that your data will be secure.

Disclosure of Your Information: We do not disclose any nonpublic information about our customers or former customers to anyone, except as permitted by law. We may disclose Your Information to or as directed by your custodian/brokerage firm or when we believe it necessary for the conduct of our business, or where disclosure is required or permitted by law. Your Information may be disclosed for audit or research purposes, to attorneys, auditors, consultants, or other professional and technical service providers, or suppliers, or to law enforcement and regulatory agencies, for example, to help us prevent fraud.

In addition, we may disclose Your Information to affiliated and non-affiliated third party service providers (i) in connection with delivering contracted services to you, to enable them to provide business services for us or your custodian/brokerage firm, such as performing computer related or data maintenance or processing services, (ii) to facilitate the processing of transactions on your behalf, (iii), to assist us in offering products and services to you or to assist your custodian/brokerage firm, investment advisor, third party service providers in offering products and services to you, or (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, we will not make any disclosures of Your Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company. It is our policy to require all third parties, other than your brokerage firm and affiliates, that are to receive any of Your Information to sign strict confidentiality agreements.

Former Customers: Even if you are no longer a customer, our Privacy Policy will continue to apply to you. We retain your personal information for as long as we have a relationship with you and for a period after the relationship has ended. We will not keep personal data for longer than is necessary and will take reasonable steps to destroy your personal data if it is no longer needed or required to be maintained. When determining how long to keep your personal information after our relationship with you has ended, we must take into account how long we will need to retain the information to fulfill the purposes described above and comply with regulatory obligations including the U.S. Securities and Exchange Commission's record retention requirements. Please contact us if you would like more information about the retention period and destruction methods.

To Whom This Policy Applies: This Privacy Policy applies to products or services provided by us to our customers.

Access To and Correction of Your Information: We will take reasonable steps to make sure that the personal data we collect, use or disclose is accurate, complete and up to date. If you desire to review any file, we may maintain for your personal Your Information, please contact us. If you notify us that any Your Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Your Information. Subject to local law, you may have certain rights regarding your personal information. We reserve the right to charge a fee (representing our costs in administering your request) for supplying such information and to refuse requests which, in our opinion, occur with unreasonable frequency. Your Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available, unless required by law.

Further Your Information: We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. You may have additional rights under other state or foreign laws that may apply to you. If you have any questions or concerns about our Privacy Policy, please contact our Chief Compliance/Data Protection Officer at telephone: (561) 241-9301, or via email at ssherman@csadvisorsinc.com.